

Appendix A to the Declaration of E. Evans Wohlforth, Esq.

Document Title/ECF No.	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
JJHCS's (with its affiliates, "J&J") Motion for In Camera Review of Text Messages. [ECF No. 322.]	The motion contains: (1) direct quotations from documents produced to J&J containing SaveOnSP's ("SaveOn") confidential and proprietary marketing strategy and business plan; <i>see</i> ECF No. 322, Ex. 1-5, 9, 11, 13-15, 17-19; and (2) direct references to documents produced to J&J containing SaveOn's confidential and proprietary marketing strategy and business plan; <i>see</i> ECF No. 322 Ex. 6-8, 10, 12, 16.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Motion is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 1 to motion dated June 20, 2024	Exhibit 1 is a confidential text message conversation between Jody Miller and Megan Pacisznyk dated May 26,	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's	No	No objection

[ECF No. 322.]	2022, discussing confidential marketing strategy and business plans. <i>See ECF No. 322 at Ex. 1.</i>	non-public business information and strategy be disclosed to competitors and other market participants.	proprietary business information.		
Exhibit 2 to motion dated June 20, 2024 [ECF No. 322.]	Exhibit 2 is a confidential text message conversation between Jody Miller and Megan Pacisznyk dated June 2, 2023, discussing confidential marketing strategy and business plans and confidential litigation strategy. <i>See ECF No. 322 at Ex. 2.</i>	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 3 to motion dated June 20, 2024 [ECF No. 322.]	Exhibit 3 is a confidential text message conversation between Jody Miller and Megan Pacisznyk dated June 14, 2023, discussing confidential marketing strategy and business plans and confidential litigation strategy. <i>See ECF No. 322 at Ex. 3.</i>	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 4 to motion dated June 20, 2024 [ECF No. 322.]	Exhibit 4 is a confidential text message conversation between Jody Miller and Megan Pacisznyk dated June 24, 2023, discussing	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	confidential marketing strategy and business plans and confidential litigation strategy. <i>See ECF No. 322 at Ex. 4.</i>	be disclosed to competitors and other market participants.			
Exhibit 5 to motion dated June 20, 2024 [ECF No. 322.]	Exhibit 5 is a confidential email chain between SaveOn and ESI employees about copay assistance programs comprised of information about SaveOn's proprietary business model. <i>See ECF No. 322 at Ex. 5.</i>	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 6 to motion dated June 20, 2024 [ECF No. 322.]	Exhibit 6 is a confidential email chain between SaveOn and ESI employees about drug lists comprised of information about SaveOn's proprietary business model. <i>See ECF No. 322 at Ex. 6.</i>	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 7 to motion dated June 20, 2024 [ECF No. 322.]	Exhibit 7 is a confidential email chain between SaveOn employees about state legislation comprised of information about SaveOn's proprietary business model and	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	marketing strategy. <i>See</i> ECF No. 322 at Ex. 7.				
Exhibit 8 to motion dated June 20, 2024 [ECF No. 322.]	Exhibit 8 is a confidential email chain between SaveOn and ESI employees about a customer question about SaveOn comprised of information about SaveOn's proprietary business model. <i>See</i> ECF No. 322 at Ex. 8.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 9 to motion dated June 20, 2024 [ECF No. 322.]	Exhibit 9 is a confidential email between SaveOn and a client about this litigation comprised of information about SaveOn's proprietary business model and marketing strategy. <i>See</i> ECF No. 322 at Ex. 9.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 10 to motion dated June 20, 2024 [ECF No. 322.]	Exhibit 10 is a confidential Operating Agreement for Breakwall Holdings, LLC comprised of information personal financial information belonging to SaveOn managers. <i>See</i> ECF No. 322 at Ex. 10.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 11 to motion	Exhibit 11 is a confidential email chain	If relief is not granted, SaveOn would be at a	It is believed that no less restrictive alternative is	No	No objection

dated June 20, 2024 [ECF No. 322.]	between SaveOn and ESI employees about SaveOn's clients' savings comprised of information about SaveOn's proprietary business model. <i>See ECF No. 322 at Ex. 11.</i>	competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	available to prevent the disclosure of SaveOn's proprietary business information.		
Exhibit 12 to motion dated June 20, 2024 [ECF No. 322.]	Exhibit 12 is a confidential email chain between SaveOn and ESI employees about client and member outreach comprised of information about SaveOn's proprietary business model. <i>See ECF No. 322 at Ex. 12.</i>	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 13 to motion dated June 20, 2024 [ECF No. 322.]	Exhibit 13 is a confidential email chain between SaveOn and ESI employees about calls with patients comprised of information about SaveOn's proprietary business model. <i>See ECF No. 322 at Ex. 13.</i>	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 14 to motion dated June 20, 2024 [ECF No. 322.]	Exhibit 14 is a confidential email chain between SaveOn and ESI employees about a client relationship comprised of information about	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	SaveOn's proprietary business model. <i>See</i> ECF No. 322 at Ex. 14.	be disclosed to competitors and other market participants.			
Exhibit 15 to motion dated June 20, 2024 [ECF No. 322.]	Exhibit 15 is a confidential email chain between SaveOn and ESI employees about communications with patients comprised of information about SaveOn's proprietary business model and marketing strategies. <i>See</i> ECF No. 322 at Ex. 15.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 17 to motion dated June 20, 2024 [ECF No. 322.]	Exhibit 17 is a confidential email chain between SaveOn and ESI employees about communications with patients comprised of information about SaveOn's proprietary business model and marketing strategy and confidential patient health information. <i>See</i> ECF No. 322 at Ex. 17.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 18 to motion dated June 20, 2024	Exhibit 18 is a confidential email chain between SaveOn and ESI employees about drug lists comprised of	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's	No	No objection

[ECF No. 322.]	information about SaveOn's proprietary business model. <i>See</i> ECF No. 322 at Ex. 18.	non-public business information and strategy be disclosed to competitors and other market participants.	proprietary business information.		
Exhibit 19 to motion dated June 20, 2024 [ECF No. 322.]	Exhibit 19 is a confidential email between SaveOn and ESI employees regarding copay assistance programs comprised of information regarding SaveOn's proprietary business model and marketing strategy. <i>See</i> ECF No. 322 at Ex. 19.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
SaveOn's Opposition to J&J's Motion for In Camera Review of Text Messages. [ECF No. 325.]	The motion contains: (1) direct quotations from documents produced to J&J containing SaveOn's confidential and proprietary marketing strategy and business plan; <i>see</i> ECF No. 325 Ex. 15; and (2) direct references to documents produced to J&J containing SaveOn's confidential and proprietary marketing strategy and business plan; <i>see</i> ECF No. 325 Ex. 1-4, 16.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Motion is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

Exhibit 2 to motion dated July 1, 2024 [ECF No. 325.]	Exhibit 2 is a letter containing: (1) a direct quotation from documents containing SaveOn's confidential and proprietary business model and marketing strategy, <i>see</i> ECF No. 325 Ex. 4 and (2) a direct reference to SaveOn's confidential marketing strategy and business plan, <i>see</i> ECF No. 325 Ex. 4.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Motion is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 3 to motion dated July 1, 2024 [ECF No. 325.]	Exhibit 3 is a letter from SaveOn to a health plan advisor about this litigation containing the advisor's personal information. <i>See</i> ECF No. 325 at Ex. 3.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Motion is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
J&J's Reply to SaveOn's Opposition to J&J's Motion for In Camera Review of Text Messages.	The motion contains: (1) direct quotations from documents produced to J&J containing SaveOn's confidential and proprietary marketing strategy and business plan; <i>see</i> ECF No. 333 Ex. 1, 2, 4.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Motion is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

[ECF No. 333.]					
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